

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA	*	
Plaintiff	*	Case No. 20-mj-1429-CBD
v.	*	(Criminal Information No. 21-cr-38-GLR)
CHARLES NABIT	*	Pre-Trial Release Order – Magistrate Judge Gesner
Defendant	*	
* * * * *		

**CONSENT MOTION FOR PERMISSION TO TRAVEL
WITH SON TO FREDERICKSBURG, VIRGINIA – MAY 29-30, 2021**

Defendant, Charles Nabit, by Steven A. Allen, his attorney, submits this Motion for Permission to Travel with his Son – May 29-30, 2021. Both Pre-Trial Services and the Government have consented to the request made herein.

1. Defendant Nabit was originally arrested on June 10, 2020, on which date he had his initial appearance before Magistrate Judge Beth P. Gesner.

2. At the time of Defendant Nabit’s initial appearance, Magistrate Judge Gesner established Conditions of Release which included, *inter alia*, release on his personal recognizance, the execution by Defendant Nabit of an Appearance Bond and Agreement to Forfeit against a multi-million dollar property, Defendant Nabit’s home in Baltimore City, that Defendant Nabit surrender his passport and that Defendant Nabit not be permitted to leave the State of Maryland without first obtaining Court permission. On March 17, 2021, Defendant Nabit’s Conditions of

Release were amended to permit him to travel to portions of Delaware without first having to obtain the Court's permission, Document 39.¹

3. Mr. Nabit's Conditions of Release were continued by the Court at the time he entered his plea on April 9, 2021.

4. Since June 10, 2020, Defendant Nabit's Pre-Trial Services Officer confirms that Mr. Nabit has satisfactorily been in full compliance with all of the Conditions of his Release.

5. Since his release, the Court has issued Orders permitting Defendant Nabit to travel outside of Maryland, June 18, 2020 Order, Document 20, July 6, 2020 Order, Document 23, July 23, 2020 Order, Document 31 and April 2, 2021, Document 12. Mr. Nabit fully complied with each Order.

6. Mr. Nabit is seeking permission to travel with his son to Fredericksburg, Virginia, to a tennis tournament in which his son Alex will be participating, during the period May 29 and 30, 2021. Mr. Nabit will travel by automobile with Alex to the Fredericksburg, Virginia area on May 29, spend the night with his son in Virginia and then return home to Baltimore with Alex on May 30, 2021.

7. Defendant Nabit's Pre-Trial Services Officer has advised that she consents to the Request to Travel.

8. The Government has advised that it consents to this Motion.

WHEREFORE, it is requested that the Court enter an Order permitting Mr. Nabit to travel to Fredericksburg, Virginia during the period May 29-30, 2021.

¹ Two Orders were issued amending the Conditions of Release, one on March 17, 2021, Document 39 in Case No. 8:20-mj-01429, and March 18, 2021, Document 7 in Case No. 21-cr-38.

Respectfully submitted,

/s/ Steven A. Allen

Steven A. Allen (Federal Bar No. 00607)

sallen@pklaw.com

Pessin Katz Law, P.A.

901 Dulaney Valley Road, Suite 500

Towson, MD 21204

410-339-6779

410-832-5602 (fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of May, 2021, the foregoing was served upon counsel for the United States via electronic filing.

/s/ Steven A. Allen

Steven A. Allen (Federal Bar No. 00607)